

**FITAPELLI  
SCHAFER &**  
ATTORNEYS AT LAW

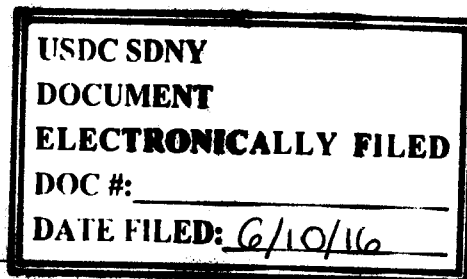
28 Liberty Street • New York, NY 10005  
Telephone: (212) 300-0375 • Facsimile: (212) 481-1333 • www.fslawfirm.com

June 10, 2016

**Via ECF**

Hon. Richard M. Berman, U.S.D.J.  
United States District Court, S.D.N.Y.  
500 Pearl Street, Courtroom 17B  
New York, New York 10007

**Re: *Martinez v. Major Fire Protection Corp. et al.***  
**Case No: No. 16 Civ. 3753 (RMB)**



Dear Judge Berman:

We represent the Plaintiff and a putative class of employees who have worked for Major Fire Protection Corp. in New York. The Initial Pretrial Conference is scheduled for June 22, 2016. The parties were directed to jointly complete a case management plan in advance of the conference.

We write pursuant to Section 1(D) of Your Honor's Individual Rules of Practice to respectfully request an adjournment of the Initial Pretrial Conference to a new date in mid-July. Plaintiff requests the adjournment of the Initial Pretrial Conference because Defendants have only recently been served and their Answer is not due until June 22, 2016. This is Plaintiffs' first request for an adjournment for the Initial Pretrial Conference.

We are currently unaware whether the Defendants oppose or consent to this request as they have yet to respond to the Complaint.

*A.k.a. granted.*

~~We thank the Court for its consideration~~ of our request.

*Rule 16 conference adjourned  
until 7/14/16 @ 9:30*

SO ORDERED:

Date: *6/10/16*

*Richard M. Berman*

cc: *Richard M. Berman, U.S.D.J.*  
*Defendants (via U.S. Mail)*

Major Fire Protection Corp.  
520 50<sup>th</sup> Avenue  
Long Island City, NY 11101

Respectfully submitted,

*Brian Schaffer*

Brian S. Schaffer